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| UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-2(c) Robert Manchel, Esq. 1 Eves Drive, Suite 111 Marlton, NJ 08053 Attorney for Debtor RM-1141 | |
| In Re: Karen Prokapus | Case No. 16-14196MBK Judge: Chapter 13 |

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO
X CREDITOR'S MOTION or CERTIFICATION OF DEFAULT
TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following **(choose one)**:

1. X Motion for Relief from the Automatic Stay filed by Wells Fargo Bank, NA creditor. A hearing has been scheduled for June 25, 2019, at 10:00 a.m.

OR

 Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has been scheduled for at a.m.

OR

 Certification of Default filed by Wells Fargo Bank NA., creditor. I am requesting that a hearing be scheduled on this matter.

OR

 Certification of Default filed by Standing Chapter 13 Trustee. I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

_____ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support is attached hereto.

OR

_____ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

OR

X Other: I will cure the arrears and pay the regular payments, by making the following payments:

Paid \$3,274.67 on or about 6/5/2019;
Payment of \$3,274.67 on 7/19/19;
Payment of \$3,274.67 on 8/1/19;
Payment of \$3,274.67 on 8/22/19;
Beginning in September 2019 two (2) payments of \$3,274.67 on the 25th of each month until all arrears are cured.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 6/18/2019

/s/ Karen Prokapus, Debtor
Karen Prokapus, Debtor